



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 17, 2008

Tim Morgan, Treasurer (Attn: Jay Banning)
Republican National Committee
310 First Street, SE
Washington, DC 20003

Response Due Date:
October 20, 2008

Identification Number: C00003418

Reference: August Monthly Report (7/1/08-7/31/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 items:

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

28039833743

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

2. Schedule B supporting Line 21(b) discloses voided checks to "Dell Marketing L.L.P" totaling -\$2,284.20, -\$3,095.27 and -\$1,226.69, and a voided check to "Dontatelli, Frank" totaling -\$682.47, however, it appears that original disbursements for these totals have not been reported by your committee. Please amend the report covering the period(s) during which the contribution(s) was disbursed and disclose the original date of the contribution.

3. Schedule B supporting Line 21(b) discloses refunds of contributions received from "Berkman, Craig Leon Mr.," "Robert, Rothman Mrs.," "DeGeorge, Lawrence J. Mr." and "Wachtell, Esther Mrs." These refunds are reported as MEMO entries linked to transfers to "McCain Victory 2008" and "McCain Victory Committee," which are Joint Fundraising Representatives of your Committee. However, contributions from these individuals do not appear to have been reported as being received by your Committee from these Joint Fundraising Representatives. Please amend the appropriate report(s) to disclose the original date of the contribution on Schedule A supporting Line 11(a)(i) of the Detailed Summary Page.

4. The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the

28039833744

purpose of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please amend Schedule E by providing the calendar year-to-date, per election, for office sought total. 11 CFR §104.3(b)(3)(vii)

5. Your committee filed 48 hour notices informing the Commission of independent expenditures made in support or opposition of federal candidates with "OnMessage Inc." as the payee(s). However, the amounts and dates of public dissemination disclosed on these notices do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour notices supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Refunds of contributions from individuals should be properly disclosed on a separate Schedule B, supporting Line 28(a) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1177.

28039833745

REPUBLICAN NATIONAL COMMITTEE

Page 4

Sincerely,

Corbin T. Jones

Corbin T. Jones

Senior Campaign Finance Analyst
Reports Analysis Division

222

28039833746

REPUBLICAN NATIONAL COMMITTEE

Page 5

Contributor Name	Date	Amount	Report
Gregory, John Mr.	7/31/08	\$22,700.00	2008 August Monthly
Gregory, John Mr.	7/31/08	\$26,200.00	2008 August Monthly
Fairbanks, Shannon	5/7/08	\$28,500.00	2008 June Monthly
Fairbanks, Shannon Mrs.	7/31/08	\$25,400.00	2008 August Monthly
Tickle, John D. Mr.	5/5/08	\$1,000.00	2008 June Monthly
Tickle, John D.	5/7/08	\$28,500.00	2008 June Monthly
Tickle, John D. Mr.	7/17/08	\$1,000.00	2008 August Monthly

28039833747

28039833748

